

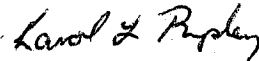
ACTION MEMORANDUM  
ORDNANCE AND EXPLOSIVES (OE)  
TIME CRITICAL REMOVAL ACTION (TCRA)  
SWMU 6 (OLD BURN AREA)  
TOOELE ARMY DEPOT, TOOELE, UTAH

1. The purpose of this Action Memorandum is to justify the need for, detail, and explain the rationale for a Time Critical Removal Action (TCRA), proposed for a 37-acre area of property on the Tooele Army Depot, in Tooele County, Utah. Solid Waste Management Unit (SWMU) 6, the Old Burn Area, is located on the active installation. Tooele Army Depot is authorized to respond under the Defense Environmental Restoration Program (DERP) and the National Contingency Plan (NCP) where substantial and imminent Ordnance and Explosive (OE) hazards exist.
2. Tooele Army Depot is currently on the National Priorities List (NPL). SWMU 6 is located in the south-central portion of Tooele Army Depot. The area consists of approximately 37 acres of gently sloping, grassy, open property with four bermed revetments located in the eastern portion of the site. Due to delays in the CERCLA approval process, the site, including any OE hazards, is currently accessible to military personnel. Since the CERCLA approval process delay may continue for a year or more and with the influx of new military personnel at Tooele Army Depot who may be unaware of the dangers at this site, the risk of injury to personnel and equipment is increasing. Immediate action is required because the possibility exists for serious injury to anyone entering the site without appropriate precautions. Serious injury, death, and/or destruction of property may occur if the removal action described in this Action Memorandum is not performed.
3. SWMU 6 had been characterized during the Remedial Investigation/Feasibility Study (RI/FS) process and a remedy has been selected to remove OE and contaminated soil from the site. The site was the location of munitions testing and burning of boxes and wooden crates on the ground and in shallow trenches. Most of the area has been filled and regraded; however, the trenches still contain metal debris, spent or destroyed munitions and the potential for Unexploded Ordnance (UXO). Previously at the site, the following OE items were identified: burned smoke grenades, burned smoke pots, burned impact fuzes, smoke grenades and smoke pots, 5.56-mm bullet, primers, igniters, and a flare. No live munitions were found. Currently, the site is awaiting Record of Decision (ROD) approval to proceed with the selected remedy of excavation and solidification/stabilization of lead-contaminated soil and excavation and off-post disposal of 2,4-DNT contaminated soil.
4. Current and ongoing regulatory authority for this site is provided by Mr. Jim Kieffer, Region VIII, U.S. Environmental Protection Agency, and Mr. Rik Ombach, State of Utah, Department of Environmental Quality, Division of Environmental Response and Remediation. The USEPA is the lead agency for this site.
5. The action proposed for this site is fencing to prevent unauthorized entry onto the site. The fence will contain signs approximately every 100 feet to ensure good visibility to troops on patrol. This action will prevent personnel and equipment from coming in contact with the OE hazards at the site until such time that the selected remedy can be performed. During the RI/FS process, numerous remedies were identified for SWMU 6. However, without approval of the ROD, performing a TCRA for fencing is the only remedy that is appropriate for implementation in the short-term. While the installation of a fence at this site does not

contribute to the long-term remediation at the site (using the selected remedy upon approval of the ROD), the fence can also be utilized during construction to prevent unauthorized access during construction. The administrative record for this action will be included in the administrative record for Tooele Army Depot, already in existence at Tooele City Public Library in Tooele, Utah, and the Marriott Library at the University of Utah in Salt Lake City, Utah. The estimated cost of this TCRA is \$45,000. Fieldwork for this TCRA is scheduled to begin 20 October 2003 and last approximately 2-3 weeks.

6. Applicable or Relevant and Appropriate Requirements (ARARs) that may apply to SWMU 40 at Tooele Army Depot include: Fugitive Dust Control (UAC R307-101), Fugitive Emissions and Fugitive Dust applicable to Tooele County (R307-205), Archaeological and Historic Preservation (16 USC Sec 469 UCA, Title 9 Chapter 8; UAC R212), and Emissions Standards (UAC R201-1).
7. The US Army is the sole responsible party for this site and is responsible for implementation of this TCRA.
8. Based on the above facts, and in consultation with interdisciplinary support from the U.S. Army Corps of Engineers and appropriate external coordination, I have determined that an imminent and substantial risk exists at SWMU 6, Tooele Army Depot, Tooele, Utah, and recommend a TCRA to address the situation. This decision document represents the selected removal action for SWMU 6, Tooele Army Depot, Tooele County, Utah, developed in accordance with CERCLA as amended, and not inconsistent with the NCP. This decision is based on the administrative record for this site.

Sincerely,



Karol L. Ripley  
LTC, OD  
Commanding

RAWP-SWMU 6  
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